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*Attorneys for Defendants City of Surprise, Skip Hall and Steven Shernicoff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Rebekah Massie; and Quintus Schulzke ,

Plaintiffs,

vs.

City of Surprise, a municipal corporation and  
a governmental entity; Skip Hall, in his  
individual capacity; and Steven Shernicoff,  
in his individual capacity,

Defendants.

Case No.: 2:24-cv-02276-ROS--DMF

**STIPULATED MOTION TO  
EXTEND TIME TO ANSWER OR  
RESPOND OTHERWISE TO  
PLAINTIFFS' COMPLAINT**

Plaintiffs Rebekah Massie and Quintus Schulzke and Defendants City of Surprise, a municipal corporation and a governmental entity, Skip Hall, in his individual capacity, and Steven Shernicoff, in his individual capacity, by and through undersigned counsel, hereby file this stipulated motion for an extension of time for Defendant City of Surprise to answer or respond otherwise to Plaintiffs' Complaint. The current deadline is September 26, 2024. Defendant City of Surprise requests up to and until November 4, 2024 (the deadline for Defendant Skip Hall and Defendant Steven Shernicoff's answer or other response to Plaintiffs' Complaint pursuant to Waivers of Service of Summons,

1 Docs. 11 and 12, respectively) to file its answer. This request is made so defense counsel  
2 can investigate the allegations contained in Plaintiffs' Complaint and engage in LRCiv.  
3 12.1 discussions with Plaintiffs' counsel.  
4

5 This Motion is made for good cause, in good faith, and not for the purpose of undue  
6 delay. A proposed Order is attached hereto as Exhibit A.

7 DATED this 26<sup>th</sup> day of September, 2024.  
8

9 JELLISON LAW OFFICES, PLLC

10 By: s/ James M. Jellison

11 James M. Jellison, Esq.

12 *Attorneys for Defendants City of Surprise, Skip  
13 Hall and Steven Shernicoff*

14 FOUNDATION FOR INDIVIDUAL RIGHTS  
15 AND EXPRESSION

16 By: s/ Conor T. Fitzpatrick

17 Conor T. Fitzpatrick, Esq.

18 *Attorneys for Plaintiffs Rebekah Massie and  
19 Quintus Schulzke*

20 **CERTIFICATE OF FILING AND MAILING**

21 I hereby certify that on September 26, 2024, I electronically transmitted the attached  
22 document to the Clerk's office using the CM/ECF system for filing and transmittal of a  
23 Notice of Electronic filing to the following registrant:

24 Daniel J. Quigley  
25 (State Bar No. 011052)  
26 DANIEL J. QUIGLEY, P.L.C.  
27 5425 E. Broadway Blvd., Ste. 352  
28 Tucson, AZ 85711  
[quigley@djqlc.com](mailto:quigley@djqlc.com)

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7 Adam B. Steinbaugh  
8 (Penn. 326476 / Cal. 304829) FOUNDATION FOR INDIVIDUAL  
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12 [adam@thefire.org](mailto:adam@thefire.org)

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By: s/ Valerie Hall